

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHERYL SATTERTHWAITE, AS
EXECUTRIX OF THE ESTATE OF
DENNIS SATTERTHWAITE,

Plaintiff

v.

UNITED STATES OF AMERICA, UHS
OF WESTWOOD PEMBROKE, INC.,
ARTHUR N. PAPAS, M.D. AND
CATHERINE SULLIVAN, R.N.C.,

Defendants

NO. 05-10606-WGY

PLIANTIFF'S PRETRIAL DISCLOSURES PURSUANT TO F.R.C.P. 26(A)(3)

The plaintiff, Sheryl Satterthwaite, as Executrix of the Estate of Dennis

Satterthwaite, hereby submits her Pretrial Disclosures pursuant to F.R.C.P. 26(a)(3):

A. Plaintiff's Witnesses Anticipated to Testify at Trial

1. Sheryl Satterthwaite
58 Highland Road
Abington, MA
(781) 871-5106
2. Renee Satterthwaite
58 Highland Road
Abington, MA
(781) 871-5106
3. Lauren Satterthwaite
58 Highland Road
Abington, MA
(781) 871-5106
4. Arthur Papas, M.D.
5 Byron Road
Weston, MA

5. Catherine Sullivan, R.N.
36 Grandfield St.
Dedham, MA
6. John Randolph, Ed.D.
43 Starbird Street
Malden, MA
7. Amy Mach
22 State Street, Apt. 6
Taunton, MA
8. Elizabeth Condron, R.N.
96 Main Street
Foxborough, MA
9. Patricia Loughman-West
49 Sunrise Road
Westwood, MA
10. Karen Braunwald, M.D.
28 Brooks Road
Wayland, MA
11. Valerie Packard
302 Walpole Street
Norwood, MA
12. Sadie-Anne Maroon
401 Belmont Street
Brockton, MA
13. Monica Gordon
4 Marcella Street
Roxbury, MA
14. David Marinelli (if needed)
138 Utica Street, Apt. 4
Quincy, MA
15. Kimlisa Gregory (if needed)
54 Central Avenue
Hull, MA
16. Marc Silbret, M.D. (if needed)
McLean Hospital
115 Mill Street
Belmont, MA 02478

17. Mark Longsjo, L.I.C.S.W. (if needed)
McLean Hospital
115 Mill Street
Belmont, MA 02478

18. Sgt. J. Sullivan (if needed)
Quincy Police Department
1 Sea Street
Quincy, MA 02169

B. Plaintiff's Witnesses Whose Testimony is Expected to be Presented by Deposition

1. Norman Satterthwaite (if needed)
Pinehurst Village
12 Bayberry Lane
Plymouth, MA

C. Exhibits/Documents Expected to be Offered into Evidence

1. Emergency Room Records, Jordan Hospital, 4/28/02
2. McLean Hospital Records, 4/28 – 5/6/02
3. Westwood Lodge Hospital Records, 5/7/02 – 5/25/02
4. Acces Intake Records, 5/24/02 and 5/25/02
5. Nova Psychiatric Services Bills, 9/6/00 and 5/24/02
6. Boston VA Records, 2/12/96 – 6/17/02
7. Department of Mental Health Investigation Report, 9/10/02
8. Policies and Procedures of Westwood Lodge Hospital and the Arbour Hospital System Produced by the Department of Mental Health:
 - a. Arbour Hospital Intake Procedures for U.H.S. of Westwood/Pembroke, Effective Date 3/00;
 - b. Arbour Hosital Admission Procedure, Policy Number 2.2.2, Effective Date 9/1/95, Reviewed Date, 11/1/01;
 - c. Westwood Pembroke Health System Intake and Assessment Process, Department, Partial Hospitalization, Effective Date, 7/1/05, Reviewed 11/12/01;

- d. Westwood Pembroke Health System Referral to the ACCESS, Department, Access Effective Date 4/93, Reviewed Date 5/95;
 - e. Westwood Pembroke Health System Client Eligibility, Department, Access, Effective Date 4/93, reviewed Date 5/95;
 - f. Westwood Pembroke Health System Disposition of Scheduled Walk-In Assessment, Department, Access, Effective Date, 5/84, Reviewed Date, 9/1/95 and 11/1/01;
 - g. Westwood Pembroke Health System Voluntary and Involuntary Admissions, Clinical Services, Policy Number, RI0008, Date Issued 1/98;
 - h. Westwood Pembroke Health System Admission Procedure, Clinical Services, Policy Number, TX.001, Date Issued 1/98, Date Reviewed/Revised 11/01;
 - i. Westwood Pembroke Health System Interdisciplinary Treatment Plan, Clinical Services, Policy Number, CS 018, TX.004, Date Issued 12/13/96, Date Reviewed/Revised 1/98 and 11/01;
 - j. Westwood Pembroke Health System Interdisciplinary Treatment Plan Partial Hospitalization, Clinical Services, Policy Number CS 027-PHP TX.005, Date Issued 8/97, Date Reviewed/Revised 11/01;
 - k. Westwood Pembroke Health System Treatment Planning Intensive Outpatient Program Clinical Services, Policy Number TX.006, Date Issued 1/98, Date Reviewed/Revised 11/01;
 - l. Westwood Pembroke Health System Discharge Discharge/Aftercare Planning, Clinical Services, Policy Number CS 017, CC.010, Date Issued 12/13/96, Date Reviewed/Revised 1/98 and 11/01; and
 - m. Westwood Pembroke Health System Discharge Process, Clinical Services, Policy Number CC.011, Date Issued 1/99, Date Reviewed/Revised 11/01
- 9. Interview Notes of Amy Mach, Department of Mental Health investigator
 - 10. Policies and Procedures of Westwood Lodge Hospital and the Arbour Hospital System Produced by the defendant, UHS of Westwood Pembroke, Inc. on October 1, 2006
 - 11. Westwood Lodge Hospital Nursing Supervisor Book
 - 12. 6/26/02 Letter from Karen Braunwald, Ph.D. to Robert Spiegel, CEO

13. Blue Cross and Blue Shield Service Benefit Plan, 2002
14. Death Certificate of Dennis Satterthwaite
15. Quincy Police Department Death Scene Report, 5/30/02

PLAINTIFF,

By her attorneys,

SUGARMAN AND SUGARMAN, P.C.

Dated: May 11, 2007

/s/ David P. McCormack
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Certificate of Service

I hereby certify that a true copy of the above document was served by regular mail, postage prepaid, on May 11, 2007 upon the attorney of record for each party:

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/s/ David P. McCormack
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